

State of New Jersey
STATE ETHICS COMMISSION

PO Box 082 Trenton, NJ 08625-0082 www.nj.gov/ethics JOSEPH P. LASALA, Esq. Chair

MARK T. HOLMES, Esq. Acting Executive Director

Tel: (609) 292-1892 (888) 223-1355 in NJ Fax: (609) 633-9252 Email: ethics@ethics.nj.gov

December 6, 2017

Valerie Hayes Ethics Liaison Officer Stockton University 101 Vera King Farris Drive Galloway, New Jersey 08205-9441

Re: Waiver to the Provisions of N.J.S.A. 52:13D-17.2(b)

Dear Ms. Hayes:

CHRIS CHRISTIE

Governor

KIM GUADAGNO

Lt. Governor

At its December 5, 2017 meeting, the State Ethics Commission considered your request on behalf of Kevin Zulauf, Head Men's Lacrosse Coach, Stockton University ("Stockton"), and his fiancée, Serena Jensen. Ms. Jensen is currently employed by Bally's Hotel and Casino as a food server. Based on the facts and circumstances set forth below, the Commission granted a waiver of the general prohibition of section 17.2(b).

Generally, section 17.2(b) of the Conflicts Law prohibits all State officers and employees and members of their immediate families from holding an interest in, holding employment with, representing, appearing for, or negotiating on behalf of the holder of, or applicant for, a casino license or any holding or intermediary company with respect thereto. However, the statute also contains the following exception language:

except that ... a member of the immediate family of a State officer or employee, or person, may hold employment with the holder of, or applicant for, a casino license if, in the judgment of the State Ethics Commission ... such employment will not interfere with the responsibilities of the State officer or employee, or person, and will not create a conflict of interest, or reasonable risk of the public perception of a conflict of interest, on the part of the State officer or employee, or person

The Commission agrees that there is no conflict between Mr. Zulauf's position at Stockton and his fiancée's employment with Bally's Hotel and Casino. Mr. Zulauf's position and his fiancée's casino employment do not overlap, and there is no conflict of interest or reasonable risk of the public perceiving any kind of conflict between his State position and his fiancée's casino employment.

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Based on the facts and circumstances set forth above, the Commission granted a waiver of the general prohibition of section 17.2(b) in the case of Kevin Zulauf and his fiancée, Serena Jensen.

Very truly yours,

STATE ETHICS COMMISSION

For the Commission

Mark T. Holmes, Acting Executive Director

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